

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
) Criminal No. 15-36
)
V.)
)
ELIZABETH MCMAHAN)

DEFENDANT'S UNOPPOSED MOTION TO MODIFY
ORDER SETTING CONDITIONS OF RELEASE

AND NOW, comes the defendant, Elizabeth McMahan, by her attorney, and with respect to the above captioned matter, she represents the following:

1. Christian Trabold consents to the relief sought herein
2. Ms. McMahan is released on an unsecured bond and her travel is restricted to the Western District of Pennsylvania.
3. Elizabeth McMahan's parents reside in Wooster, Ohio, and she visits them there periodically. Elizabeth McMahan's son is a college student in Rochester, New York, and she visits him there periodically.
4. Instead of filing a Motion to obtain the Court's permission each time she travels to visit her parents and her son, the modification of the release Order which is sought herein is both prudent and reasonable.

WHEREFORE, the defendant, Elizabeth McMahan respectfully requests that the Order Setting Conditions of Release which currently restricts her travel to the Western District of Pennsylvania be modified to extend the areas in which she may travel to Ohio and New York.

Respectfully submitted,

s/ Thomas Livingston
Thomas Livingston
Assistant Federal Public Defender
Attorney ID No. 36949